

# JACOBS ENGINEERING GROUP INC

**ENVIRONMENTAL SYSTEMS DIVISION** 

TES4 105 0707 B1-000

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February 11, 1988

Mr. Jack Jojokian, Project Officer U.S. Environmental Protection Agency Room 2834B 401 M Street, S.W. Washington, D.C. 20460



RE:

Contract No. 68-01-7351 Project No. 05-B707-00 Work Assignment No. 707 Albion-Sheridan Township Landfill Albion, Michigan CERCLA, Region V

Dear Mr. Jojokian:

In accordance with Article B.2, Paragraph (c) of the referenced contract, enclosed for your review and approval are the draft work plan and cost estimates for Work Assignment No. 707. This Work Assignment will be under the direction of Dean Geers, Region V Manager, who can be reached at (312) 648-0002.

Please contact me or Dean for further clarification or discussion required.

Sincerely,

Roger L. Williams Program Manager

Enclosures

cc:

- R. Hackett, EPA Contracting Officer
- E. Howard, EPA Regional Contact
- N. Justus, EPA Primary Contact
- D. Geers, JEG Region V Manager
- C. Nagel, JEG Deputy Program Manager

# ENVIRONMENTAL PROTECTION AGENCY TECHNICAL ENFORCEMENT SUPPORT AT HAZARDOUS WASTE SITES

TES IV CONTRACT # 68-01-7351 WORK ASSIGNMENT NO. 707

> WORK PLAN FOR

POTENTIALLY RESPONSIBLE PARTY SEARCH ALBION-SHERIDAN TOWNSHIP LANDFILL ALBION, MICHIGAN

EPA REGION V

JACOBS ENGINEERING GROUPS, INC. PROJECT NUMBER 05-B707-00

PREPARED BY:

TETRA TECH, INC.

FEBRUARY 1988

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#### 1.0 INTRODUCTION

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The Albion-Sheridan Township Landfill consists of a 30 acre site located approximately 1 mile west of Albion, Michigan. This site received waste from 1966 until closure in 1981. During operation, municipal refuse and industrial wastes such as metallic sludges and paint residues were disposed of in the landfill.

#### 2.0 PROJECT APPROACH

Tetra Tech, Inc., as a subcontractor to Jacobs Engineering, has been requested to assist in identifying and describing the potentially responsible parties (PRP) that may be liable for contamination originating from the Albion-Sheridan Township Landfill site. A title search will be conducted to determine the history of ownership of the property on which the Albion-Sheridan Township Landfill is currently located. The overall history of the site will also be researched to determine past site activities and material handling practices. This determination will include a compilation of previous governmental agency enforcement actions on the site. Information regarding general site history will be obtained from interviews with area residents and from Calhoun County historical data. Data on past site enforcement actions will be obtained from review of federal, state, and local files and interviews with regulatory personnel.

The following activities have been developed to effectively accomplish the scope and content of the PRP search.

## Activity 1. Work Plan Preparation/General Administration

This activity sponsors the effort to prepare this work plan, which defines the scope of work and estimates project costs. The work plan was developed based on information supplied by U.S. EPA Region V. The work plan was prepared by Tetra Tech and reviewed by Jacobs prior to submittal to U.S. EPA for approval.

This activity also covers the general management and administrative effort required throughout this work assignment.

## Activity 2. PRP Search

Tetra Tech will perform a PRP search for the ownership of, and activities on, the property currently occupied by the Albion-Sheridan Township Landfill site. The PRP search will consist of:

- A title search including documentation of deeds, leases, agreements, mortgages, easements, liens, and other encumbrances against the title for the time period from 1962 to the present
- Review of historical information regarding the use of the property
- Determination of operations conducted by each owner identified, including the types and quantities of hazardous wastes used and/or disposed of on the property
- Preparation of a compliance history for each PRP relating to all applicable environmental laws and regulations.

The following tasks will be performed during the PRP search information acquisition phase of the Work Assignment.

#### Task 1. File Review

Tetra Tech will perform a review of appropriate government agency file sources documenting activities pertaining to PRPs and the site itself. This effort will include compilation of the environmental history and past enforcement actions on the property. These file sources will include:

• U.S. EPA regional files

- Michigan State Department of Health files, including enforcement files
- Michigan Department of Natural Resources
- Corporate history information available in the business section of the public library
- Calhoun County Health Department files
- Local regulatory and fire/police records regarding the site
- Local libraries

# Task 2. Interviews of Current Property Owners and Knowledgeable Local Personnel

Tetra Tech will conduct interviews with current property owners, former employees, adjacent residents, and local personnel to determine current and past property uses, to gain site-related information regarding previous owners and activities, and to evaluate disposal practices. Prior to conducting interviews, Tetra Tech personnel will develop letters of introduction for U.S. EPA approval, stating the purpose of any interviews or site visits. All private party interviews will be conducted following notification and approval by U.S. EPA. Tetra Tech will also review historical photographs, aerial photographs, historical newspaper articles, and other local records where available to complete this effort.

#### Task 3. Review of State and Local Tax and Business Records

Tetra Tech will search state and local tax and business record sources to acquire additional PRP, corporate, and property ownership information. To the extent possible, this information will include:

- Exact property boundaries (legal description of tracts)
- Legal ownership
- Title documentation including liens and encumbrances
- Property values
- Corporate history and current financial status
- Parent corporations or partnerships
- Site activities.

# Activity 3. Report Preparation

Reports to be prepared for the U.S. EPA during the process of identifying and describing PRPs at the Albion-Sheridan Township Landfill site will be as follows:

- A draft report summarizing findings and activities conducted under Activity 2 will be completed by 15 May 1988.
- A final report will be completed 1 month after U.S. EPA review of the draft report.

The draft and final reports will include the names and addresses of each PRP registered agent along with the current company mailing address.

#### 3.0 DELIVERABLES

Deliverables to be provided to the U.S. EPA as part of the identification of PRPs at the Albion-Sheridan Township Landfill will include a draft report, and a final report. Correspondence and reports will be sent through Jacobs Engineering to Nancy Justus, U.S. EPA Primary Contact. Data and supporting

documents collected for the PRP search will be delivered to the U.S. EPA upon completion of the final report. In addition, the monthly technical and financial status report required of all TES work assignments will be prepared.

#### 4.0 WORK SCHEDULE

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Tetra Tech will maintain close communications with the U.S. EPA Primary Contact throughout this work assignment to identify specific project needs and to provide weekly status updates by telephone. The schedule for known deliverables is shown below.

<u>Activity</u>	<u>Schedule</u>
Draft Report Submittal	15 May 1987
Final PRP Search Report	1 mo after U.S. EPA review of draft report

Review of the various agency files will commence immediately upon submittal of this work plan. Personal interviews will be scheduled with U.S. EPA approval as soon as current property owners, local interests, and other site-related parties can be identified based on file reviews and data provided by U.S. EPA.

### 5.0 PERSONNEL

The Jacobs Engineering Region V Manager on this work assignment is Dean Geers, (312) 648-0002. The Tetra Tech Work Assignment Manager for this effort is Greg Bawden (206) 822-9596.

# 6.0 INTERVIEWS/SUBCONTRACTORS/CONSULTANTS

No subcontractor or consultant support is currently planned for this work assignment. Any individual or organization not specifically identified, but who may ultimately need to be interviewed or hired, will be cleared by Jacobs Engineering through the U.S. EPA Primary Contact, Project Officer, and if appropriate, the Contracting Office.

The formal title search requested by the U.S. EPA Primary Contact, may possibly require a subcontractor to complete this task. If necessary, a title search company that is in close proximity to the property will be selected through a competitive bidding process. The need for a certified title search will be determined by the Primary Contact based on status reports provided by Tetra Tech.

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Informal interviews will be conducted with appropriate federal, state, and local officials as part of the PRP search process. These interviews will proceed without specific approval from U.S. EPA and will be documented in the project report. Additional interviews will be conducted with individuals and entities within the private sector. These interviews will be scheduled following approval from the U.S. EPA Primary Contact and a letter of introduction will be provided to each party. Interview documentation will be included as part of the PRP search final report.

## 7.0 EXCEPTIONS TO THE ASSIGNMENT, ANTICIPATED PROBLEMS, SPECIAL CONSIDERATIONS

This work plan has been developed based on the information provided by U.S. EPA. The hours, costs, and period of performance of this work plan may be affected if supplemental information is provided by U.S. EPA or if modifications to the scope of work are deemed appropriate based on the information presented in the weekly telephone progress reports.

Jacobs will notify the U.S. EPA Primary Contact when 75 percent of the hours and budget have been expended on this work assignment, in order to confirm activity completion in the remaining hours or to request an amendment to the work assignment. If the approved LOE hours are not sufficient to complete the tasks described in this Work Assignment, the amendment procedures may cause delays in the proposed work schedule.

### 8.0 QUALITY ASSURANCE

The Jacobs QA/QC Program Plan is incorporated by reference into this work assignment. This work plan and all subsequent activities and outputs, may be subject to random audits pursuant to the QA/QC Program Plan. These audits will be carried out by the Jacobs QA/QC Manager. The audit results and any corrective action will be provided as a separate report.

#### 9.0 CONFLICT OF INTEREST

To the best of our knowledge, no personal or corporate conflict of interest exists for Jacobs Engineering Group, Inc. or Tetra Tech, Inc. for the performance of work under this work assignment. If either a personal or corporate conflict of interest is discovered during the progress of this work assignment, the U.S. EPA Primary Contact and Contract Specialist will be notified.

#### 10.0 COST ESTIMATE

The estimated costs for activities described in this work plan for the PRP search assistance to U.S. EPA Region V at the Albion-Sheridan Township Landfill site are set forth in Exhibits 1 through 6 for fiscal year 1988. These costs include performance of the work assignment by Tetra Tech, with management oversight by Jacobs.

Costs for tracking budgets and preparing status reports are incurred by Jacobs and Tetra Tech for the duration of this work assignment until project close-out by U.S. EPA, regardless of the level of technical activities that occur.